**VIEWS OF ARGENTINA, BRAZIL AND URUGUAY (ABU) ON THE WORK PROGRAMME UNDER THE FRAMEWORK FOR NON-MARKET APPROACHES REFERRED TO IN ARTICLE 6, PARAGRAPH 8, OF THE PARIS AGREEMENT**

1. The governments of Argentina, Brazil and Uruguay (ABU) welcome the opportunity to express their views on the Work programme under the framework for non-market approaches referred to in Article 6, paragraph 8, of the Paris Agreement, as per paragraph 4 of the draft conclusions proposed by the Chair of the Subsidiary Body for Scientific and Technological Advice (SBSTA) at its Fifty-sixth session (SBSTA 56).
2. One of the main priorities for ABU is the climate finance agenda, which is key to the full and effective implementation of the Paris Agreement and scaled-up ambition in a post COVID-19 context. In this regard, we envisage the framework for non-market approaches referred to in Article 6.8 of the Paris Agreement as a window of opportunity to further assist participating Parties in implementing their nationally determined contributions (NDCs) in an integrated, holistic and balanced manner and as a significant instrument to contribute to sustainable development and poverty eradication. We also emphasize the importance of non-market approaches to enable voluntary cooperation among Parties in implementing their NDCs to allow for higher ambition in their mitigation and adaptation actions.
3. In response to the SBSTA invitation to submissions, ABU wishes to submit its view on:

(a) The elements of a draft decision on the schedule for implementing the activities of the work programme under the framework for non-market approaches (NMAs) referred to in Article 6, paragraph 8, of the Paris Agreement;

(b) The specifications for the UNFCCC web-based platform referred to in paragraph 8(b)(i) of the annex to decision 4/CMA.3;

(c) Actions that facilitate the implementation of nationally determined contributions and can be identified, developed and implemented through the framework for NMAs;

(d) NMAs related to initiatives, programmes and activities;

(e) How NMA initiatives and programmes, consistent with the framework for NMAs have addressed the elements of chapter II, paragraph 3(e), of the annex to decision 4/CMA.3 and other relevant criteria determined by the participating Parties, as relevant.

**SCHEDULE FOR IMPLEMENTING THE ACTIVITIES OF THE WORK PROGRAMME**

1. With respect to the schedule for implementing the work programme activities we are of the view that a timeline of five years (2022-2026) is reasonable and should be the starting point of discussions. Shorter periods may not provide enough time to operationalize the mechanism and implement the measures in a manner that is coherent and consistent with the long-term perspective of the climate change challenge. A 5-year cycle shall provide enough stability for the framework for non-market approaches to mature.
2. We also support the idea of implementing assessment cycles, as in similar UNFCCC processes for work programs, with the 1st cycle to be concluded at the end of 2023 and the 2nd cycle to be concluded in 2025, in order to provide a sound basis for the review to be finished in 2026. Moreover, ABU understands that a long-term plan shall be established to generate trust in the operationalization of the framework.
3. We also understand that the phases of identification and implementation can advance in parallel, starting in 2022, with priority being given to existing NMAs and the operationalization of the NMA web-based platform. This aims at registering NMAs in the aforementioned platform with a view to matching the needs of means of implementation (finance, technological transfer and capacity building) to support the implementation of NDCs in developing countries.
4. We understand that for the work to be effective, an initial set of focus areas should be considered and recommended at the 2nd meeting of the Glasgow Committee. Additional focus areas may be added, as needed, as long as appropriate procedures for the approval of additional focus areas is established.
5. Concerning the expected outcomes, ABU sees that a large set of workshops are to be proposed. In this regard, we draw attention to the practical nature of these workshops, which means that implementation shall be the focus of such events and that broad participation by all groups and Parties is ensured.

**SPECIFICATIONS FOR THE UNFCCC WEB-BASED PLATFORM**

1. The web-based platform shall serve developing countries in a way that accelerates and enhances the mobilization of means of implementation for NDCs and that ensures support to developing countries through finance, capacity-building and technology transfer.
2. We also support linkages to other UNFCCC information sources, to avoid duplication of information.
3. Concerning target users, we are of the view that the web-based platform shall mainly support developing country Parties through the matchmaking facility.

**ACTIONS THAT FACILITATE THE IMPLEMENTATION OF NDCS UNDER NMAS**

1. Actions that facilitate the implementation of NDCs under NMAs shall not be reliant on market-based mechanisms, nor involve the transfer of mitigation results or duplicate efforts of other UNFCCC processes. They shall provide real economic and financial incentives for domestic mitigation and adaptation actions that contribute to sustainable development and poverty eradication, be aligned with the collective quantified goal for finance and promote the involvement of the public and private sectors.
2. Regarding existing  relevant non-market approaches, mitigation mechanisms such as the Warsaw Framework for REDD+ Result Based Payments under the UNFCCC sets a good example of a potential 6.8 activity and implementation framework. Similar instruments may be developed for other sectors, thus involving financial support without the transfer of mitigation outcomes. Adaptation measures are also of high importance to allow Parties to cover the costs of adaptation to climate change.  Innovative non-market approaches may be built over this and other experiences, with a view to benefiting from the invested capacity and focusing on how to ensure consistent payments flow to host countries for the achieved results in mitigation and adaptation to climate change.
3. In this regard, searching for new and alternative approaches shall be seen in the perspective of accelerating the financial flows, from the public and private sector, to allow the implementation of domestic mitigation and adaptation measures, in line with the NDCs and the long-term goals of the Paris Agreement. Without duplicating efforts, but searching for higher ambition and enhancements of NDCs, we see Article 6.8. as a complementary mechanism to assist Parties in the implementation of their NDCs in the context of sustainable development and poverty eradication.
4. The framework may benefit from a classification of actions with respect to the types of contribution that each NMA can provide. For example, some approaches may facilitate technology transfer, while others may provide financial resources for NDC implementation. For transparency purposes and in order to facilitate the matchmaking action, this classification shall allow to clearly distinguish between: 1) capacity building, 2) technology transfer and 3) provision of financial resources. Other categories or tags may apply based on the diversity of NMAs, including, for instance, enhancing transparency in reporting, information sharing, networking, among others.

**NMAS RELATED TO INITIATIVES, PROGRAMMES AND ACTIVITIES**

1. With respect to focus areas, we welcome the synthesis report and further proposal of additional focus areas, which may include innovative and additional climate financial and economic mechanisms, framed under Article 6.8 activities. We support the inclusion of social inclusivity, financial policies and measures, just transition of the workforce, and the adaptation benefit mechanism as additional focus areas to be included.
2. Under financial policies and measures, non-market approaches may additionally include a) payments for ecosystem services and b) debt for climate action swaps. Other innovative instruments may be explored under the work program in the spirit of accelerating and enhancing the access to means of implementation for mitigation and adaptation actions.
3. Priority shall be given to NMAs that fall under the scope of NDCs to enable full implementation and help meet country NDCs while fostering sustainable development and poverty eradication. The operationalization of implementation measures shall also be prioritized against the identification of new, potential NMAs and focus areas, to allow the mechanisms fulfill its mandate.
4. Synergies, overlaps and complementarities between NMAs and other financial instruments shall be clarified, to avoid duplication and facilitate the implementation of NMAs. In this sense, clarity is required on how existing NMAs, as those noted in the SBs 2022 in-session workshop on NMAs, are facilitated under the 6.8 mechanism, not to add additional constraints to the implementation of existing programs and initiatives.
5. Unspecified and unclear NMAs reported in the synthesis report shall be categorized and clarified.

**HOW NMAS ARE CONSISTENT WITH THE FRAMEWORK FOR NMAS**

1. Participating Parties in NMAs shall demonstrate how the elements in Chapter II, para. 3 are fulfilled. An initial report describing how these elements are addressed may be required to register the NMA in the web-based platform.
2. With respect to elements of chapter II, paragraph 3(e), some of the approaches that may be facilitated under the framework of 6.8, such as REDD+ Framework (UNFCCC), already account for such or similar safeguards. In these cases, a fast-track procedure may be implemented, not to add additional requirements that may disincentive their implementation. In the case where these safeguards are not addressed in the initiatives, programs and activities, the proposed NMAs shall demonstrate that these safeguards are ensured.